

ENTERGY GULF STATES, INC.
PUBLIC UTILITY COMMISSION OF TEXAS
Docket No. 22356

Response of: Entergy Gulf States, Inc.
to the Fifty Eighth Set of Data Requests
of Requesting Party: Cities

Prepared By: Mark Young
Sponsoring Witness: Robert Hahne
Beginning Sequence No.
Ending Sequence No.

Question No.: CITIES 58 -54

Part No.:

Addendum:

Question:

Referring to Mr. Hahne's rebuttal testimony, page R3-158, lines 11-13, provide all examples of instances where the billing methods of other companies are not consistent with those methods used by ESI.

Response:

The Company objects to responding to this question, however, the Company will provide an answer to this question notwithstanding its objections and without waiving its rights.

Mr. Hahne's Rebuttal Testimony contains as error. Mr. Hahne's review of the allocation methods used by the five service companies referenced in response to Cities' 58-1 identified no instances where the billing methods used by these service companies (i.e., use of size based allocators) were inconsistent with the size based allocators (i.e., billing methods) used by ESI to allocate costs to affiliates.